

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA	§	
	§	No: 3:12-CR-317-L
v.	§	No: 3:12-CR-413-L
	§	No: 3:13-CR-030-L
BARRETT LANCASTER BROWN	§	

MOTION FOR LEAVE TO REPLY TO GOVERNMENTS RESPONSE

BARRETT LANCASTER BROWN, through his counsel, pursuant to L.Cr.R.47.1(f), respectfully request leave to file replies in support of the following motions:

1. Defendants Motion to Continue Trial and Pretrial Deadlines. 3:12-CR-317-L, Dkt. 80.
2. Defendants Motion to Continue Trial and Pretrial Deadlines. 3:12-CR-413-L, Dkt. 43.
3. Defendants Motion to Continue Trial and Pretrial Deadlines. 3:13-CR-030-L, Dkt. 43.

Counsel have received and reviewed the Government's responses to these motions and seek leave to reply to the arguments therein as the Government's responses (1) introduce a new issue; (2) rely on case law that is distinguishable from the present case, and (3) are predicated on inaccurate assumptions which the defendants must explain in order for this Court to fairly rule on the issues raised in their motions.

CONCLUSION

For the reasons set forth above, the Defendant respectfully request that the Court grant the defendant's motion for leave to file the above replies.

Respectfully submitted,

-s- Ahmed Ghappour

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CERTIFICATE OF CONFERENCE

I certify that on August 8, 2013, I conferred with Ms. Candina Heath, counsel for the government and she is in agreement with the relief requested.

/s/ Ahmed Ghappour

AHMED GHAPPOUR
/s/ Charles Swift

CHARLES SWIFT
/s/ Marlo P. Cadeddu

MARLO P. CADEDDU
Attorneys for Barrett Brown

CERTIFICATE OF SERVICE

I certify that today, August 8, 2013, I filed the instant motion using the Northern District of Texas's electronic filing system (ECF) which will send a notice of filing to all counsel of record.

/s/ Ahmed Ghappour

AHMED GHAPPOUR

/s/ Charles Swift

CHARLES SWIFT

/s/ Marlo P. Cadeddu

MARLO P. CADEDU

Attorneys for Barrett Lancaster Brown